

**IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA
(WILKES-BARRE)**

IN RE:)	
VINCENT GRAHAM,)	CASE NO.: 5:23-bk-00162-MJC
)	CHAPTER 13
DEBTOR.)	JUDGE MARK J. CONWAY
)	
MCLP ASSET COMPANY, INC. AS SERVICER))	
FOR NEWREZ LLC D/B/A SHELLPOINT)	
MORTGAGE SERVICING)	
)	
MOVANT)	
)	
VINCENT GRAHAM, DEBTOR)	
AND JACK N ZAHAROPOULOS, TRUSTEE)	
)	
RESPONDENTS)	

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

MCLP Asset Company, LLC as servicer for NewRez LLC d/b/a Shellpoint Mortgage Servicing has filed a Motion for Relief from Stay, with the court for Relief from the Automatic Stay of Section 362.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion, then on or before **November 27, 2023** you or your attorney must do all of the following:

(a) file an answer explaining your position at:

United States Bankruptcy Court
274 Max Rosenn U.S. Courthouse
197 South Main Street
Wilkes-Barre, PA 18701

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to Movant's attorney:

Joshua I. Goldman, Esq.
PADGETT LAW GROUP
6267 Old Water Oak Road, Suite 203
Tallahassee, FL 32312

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Mark J. Conway, the United States Bankruptcy Judge, at the United States Bankruptcy Court, 274 Max Rosenn U.S. Courthouse 197 South Main Street Wilkes-Barre, PA 18701 on **December 7, 2023, at 10:00am**, or as soon thereafter as counsel can be heard, to consider the motion.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 570-831-2500 to find out whether the hearing has been canceled because no one filed a response.

/s/ Joshua I. Goldman
Joshua I. Goldman, Esq.
Pennsylvania Bar # 205047
PADGETT LAW GROUP
6267 Old Water Oak Road, Suite 203
Tallahassee, FL 32312
(850) 422-2520 (telephone)
(850) 422-2567 (facsimile)
josh.goldman@padgettlawgroup.com
Counsel for Movant

November 10, 2023